

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Cr. No. 21-173 (PJS/DTS)

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)
ANTON JOSEPH LAZZARO,)
)
)
Defendant.)

**DEFENDANT’S MOTION
FOR DISCLOSURE OF POST-
CONSPIRACY STATEMENTS OF
CO-DEFENDANTS OR UNINDICTED
CO-CONSPIRATORS**

The Defendant, Anton Lazzaro, by and through his undersigned attorneys, respectfully moves the Court, pursuant to Rule 16(c) of the Federal Rules of Criminal Procedure and the authority of *Bruton v. United States*, 391 U.S. 123 (1968) for an order as follows:

1. Compelling the Government to give notice and disclosure of intent to use or refer to, and/or introduce into evidence at trial the statements or confessions of any co-defendant or unindicted co-conspirator, together with a designation of which statement or confessions the Government plans to so utilize; and

2. Granting the Defendant leave to file motion for severance, suppression, and/or in limine as indicated by the Government’s response and a review of the relevant *Bruton* materials.

This motion is based upon the files, records and proceedings herein, such testimony as may be presented at the motion hearing, and any briefing the Court may require thereafter.

Respectfully submitted,

Dated: January 14, 2022

/s/Catherine Turner
Catherine L. Turner
MN Attorney ID #0349057
331 Second Avenue South
Suite 705
Minneapolis, MN 55401
Tel: (612) 361-4895
Fax: (866) 663-4338
E-mail: catherine@catherineturnerlaw.com

Dated: January 14, 2022

/s/Zachary Newland
Zachary Lee Newland
Senior Litigation Counsel
Jeremy Gordon P.L.L.C.
P.O. Box 2275
Mansfield, Texas 76063
Tel: (972) 483-4865
Fax: (972) 584-9230
E-mail: zach@gordondefense.com
Texas Bar: 24088967
<https://gordondefense.com>

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was duly filed and served upon counsel of record, via the Court's CM/ECF system, this 14th day of January 2022.

/s/Catherine Turner
Catherine Turner